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October 22, 1999

Mr. Jorge Ocaña,
Commission for Environmental Cooperation,
393 St-Jacques Ouest, Bureau 200,
Montréal, Québec, H2Y 1N9 Canada.

Dear Mr. Ocana:

Re: Phase II - North American Regional Action Plan on Mercury

Honeywell is the world's largest manufacturer of thermostats of all kinds including mercury-switch thermostats. We applaud the work of the Commission for Environmental Cooperation on the North American Regional Action Plan on Mercury.

Honeywell has been a leader in advocating and modeling manufacturer responsibility for products that contain mercury. We initiated the first mercury-switch thermostat take-back program on a pilot basis in Minnesota. Now, through the Thermostat Recycling Corporation, this program has been expanded to ten states in the U.S. (ND, SD, MN, IA, WI, IL, IN, MI, OH and FL), and will shortly be expanded to the northeastern region from Pennsylvania to Maine to Virginia. We are also working on a pilot program in the Province of Ontario.

We urge you to give careful consideration to the issue of substituting other thermostats for mercury-switch thermostats. Mercury-switch thermostats are highly accurate and much more precise than their mechanical counterparts. This precision plays an important role in energy conservation. The largest anthropogenic source of mercury in the environment is the burning of coal to produce energy. Mercury-switch thermostats are perfectly safe in place. Because they are easily recycled, the mercury need never enter the waste stream or the environment. To replace them with less accurate alternatives could actually be counterproductive to the effort to keep mercury out of the environment.

Electronic thermostats, however, can be as accurate or more accurate than mercury-switch thermostats. In fact, programmable electronic thermostats like those endorsed by the USEPA Energy Star Program can play a valuable role in energy conservation and save money for thermostat consumers. Although at one time the cost of electronic thermostats was quite high compared to mercury-switch thermostats, increased volumes and competition have lowered their prices substantially. They still cost more than comparable mercury-switch thermostats, but the difference can be made up easily in energy savings over the life of the device.

We are certain that you would not want to advocate replacing mercury-switch thermostats unless the alternative was at least as beneficial to the environment. Therefore, we urge you to recommend that contractors and householders replace mercury-switch thermostats with Energy Star compliant programmable electronic thermostats. These thermostats not only provide a safer alternative to mercury-switch thermostats if they are placed in the waste stream, but they also can make a major contribution to the conservation of energy. That can help reduce emissions of a wide variety of environmental pollutants including mercury.

Sincerely,

Steve Keefe
(signature)

Director, State Government Affairs